

TALKIN, MUCCIGROSSO & ROBERTS, L.L.P.

ATTORNEYS AT LAW

40 EXCHANGE PLACE

18TH FLOOR

NEW YORK, NEW YORK 10005

(212) 482-0007 PHONE

(212) 482-1303 FAX

WWW.TALKINLAW.COM

EMAIL: INFO@TALKINLAW.COM

MARYLAND OFFICE:
5100 DORSEY HALL DRIVE
SUITE 100
ELLIOTT CITY, MD 21042

410-964-0300

NEW JERSEY OFFICE:
2500 PLAZA 5
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311

201-342-6665

March 19, 2021

Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

BY ECF

Re: United States v. Michael Hlday
20 Cr. 008 (MKB)

Dear Judge Brodie:

By this letter, Hlday respectfully requests permission to use a cellular telephone that does not have internet capabilities for the limited purpose of calling Pretrial Services (“Pretrial”), counsel, his wife and his mother. The number for this phone has been provided to the government and Pretrial and records are readily available to ensure that defendant observes the call restrictions. Additionally, defendant new Pretrial Officer in Florida noticed that Hlday’s bond inadvertently does not allow for him to both drop off, and pick up, his wife at work. Defendant respectfully requests that his bond be modified to remedy this error and permit both drop off and pick up.

The government and Pretrial consent to these applications .

Very truly yours,
Sanford Talkin
Sanford Talkin

cc: AUSA Andrey Spektor (by ECF)
AUSA Mark Bini (by ECF)
USPTO Brandon Miles (by email)